



Wisconsin Reading Coalition

Wisconsin Reading Coalition opposes the revised Specific Learning Disabilities Rule as much for what it does not do as for what it does do. This rule governs how Wisconsin children with reading disabilities are identified and set on the road to appropriate intervention. For children with SLD's in reading, early identification and appropriate intervention are critical to literacy success. The fact that almost 75% of Wisconsin students with disabilities read at a below basic level in 4th grade (NAEP, 2019), shows that we are not reaching our students with SLD in time. The SLD Rule misses the opportunity to improve the situation in two respects: it does not address the situations where students languish in multiple interventions before identification or where an alternative route to identification could save valuable time.

Response to Intervention (RTI), variously called Equitable Multi-Level Systems of Supports (MLSS) or Multi-Tiered System of Supports (MTSS), is the heart of our SLD identification process in Wisconsin. Before becoming eligible for special education in the area of SLD, students must complete two intensive interventions with unsatisfactory results. Those interventions must be scientific research-based or evidence-based.

Unfortunately, when seeking SLD identification for their child, it is all too common for parents to be told that the interventions they have already received in school do not count, and they must start over with two new interventions. This can add a year or more to the process, which has often already extended over multiple years with interventions that now do not count.

This happens because the only time we require an intervention to be evidence based or scientifically based is in the SLD process or under Statute 121.02 (1) (c) 3 ("Standard C") for students who are deemed to be at risk of reading difficulty based on the annual 4K through 2nd grade screening for reading readiness. Further, only the SLD process requires collecting sufficient data to show whether the intervention is working.

We need a rule that unambiguously states that all reading interventions beyond simple differentiation of general classroom instruction need to be scientific research-based or evidence-based, and that appropriate data be collected that can be used for potential SLD identification. Without this, we will continue the current absurd situation where some interventions are not really intervention. It wastes time and keeps children away from necessary services. It sanctions a system where some children must receive effective interventions but others need not. It lessens the chances that children will be served sufficiently in general education interventions and will not need to move into special education. The SLD Rule should specifically say that all reading

intervention, whether provided under RTI or in some other context, needs to meet the quality standards that apply to the SLD identification process.

Wisconsin would also be wise to follow the example of other states by including an alternative route to SLD identification in the SLD Rule. There are cases where it is so obvious that a child has an SLD that it serves no purpose to send them through two interventions in general education before finding them eligible for special education. Take, for instance, a child with a family history of dyslexia, performing below the 10th percentile on assessments of underlying skills, demonstrating inadequate classroom performance, and with an outside diagnosis of dyslexia or an in-school assessment showing a pattern of strengths and weaknesses typical of dyslexia. Delaying special education eligibility by requiring two general education interventions decreases the likelihood that the child will receive appropriate instruction in time to become a proficient reader.

We recommend that DPI redraft this rule, working closely with parent stakeholders whose families are directly impacted by its provisions.